

# United States District Court

FOR THE  
NORTHERN DISTRICT OF CALIFORNIA

VENUE: SAN FRANCISCO

**FILED**  
JUN 20 2017  
SUSAN Y. SOONG  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
V.

ROOZBECH IRAVANI,

**CR 17 0340**

**WHA**

DEFENDANT(S).

## INDICTMENT

18 U.S.C. § 2252(a)(4)(B) - Possession of Child Pornography;  
18 U.S.C. § 2253- Criminal Forfeiture

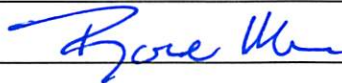
A true bill.



Foreman

Filed in open court this 20<sup>th</sup> day of

JUNE 2017



ROSE MAHER

Clerk



Bail, \$

no had a rest warrant

Laurel Beeler, U.S. Magistrate Judge

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**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT  
☐ SUPERSEDING
**OFFENSE CHARGED**
 18 U.S.C. § 2252(a)(4)(B); Possession of Child  
 Pornography;  
 18 U.S.C. § 2253 – Criminal Forfeiture

☐ Petty  
☐ Minor  
☐ Misdemeanor  
☒ Felony
**PENALTY:**
 Maximum prison term of 10 years  
 Maximum fine of \$250,000  
 Maximum term of supervised release: life  
 Mandatory special assessment of \$100
**PROCEEDING**

Name of Complainant Agency, or Person (&amp; Title, if any)

FBI Special Agent Dave Brown

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. Att'y ☐ Defense

SHOW DOCKET NO.

☐ this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

 Name and Office of Person  
 Furnishing Information on  
 THIS FORM

BRIAN J. STRETCH

☒ U.S. Att'y ☐ Other U.S. Agency

 Name of Asst. U.S. Att'y  
 (if assigned)

Randall Leonard

 Name of District Court, and/or Judge/Magistrate Location  
 NORTHERN DISTRICT OF CALIFORNIA

DEFENDANT - U.S.

Roozbeh Iravani

DISTRICT COURT NUMBER

CR 17 0340

WHA

DEFENDANT

**IS NOT IN CUSTODY**

- 1) ☒ Has not been arrested, pending outcome this proceeding.  
 If not detained give date any prior summons was served on above charges
- 2) ☐ Is a Fugitive
- 3) ☐ Is on Bail or Release from (show District)

**IS IN CUSTODY**

- 4) ☐ On this charge
- 5) ☐ On another conviction
- 6) ☐ Awaiting trial on other charges } ☐ Fed'l ☐ State

If answer to (6) is "Yes", show name of institution

 Has detainer  
 been filed?

☐ Yes  
☐ No

 If "Yes"  
 give date  
 filed

 DATE OF  
 ARREST

Month/Day/Year

Or... if Arresting Agency &amp; Warrant were not

Month/Day/Year

 DATE TRANSFERRED  
 TO U.S. CUSTODY

☐ This report amends AO 257 previously submitted
**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**
☐ SUMMONS ☐ NO PROCESS\* ☒ WARRANT Bail Amount: NO BAIL

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

\*Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time:

Before Judge:

Comments:

FILED  
2017 JUN 20 P 12:01  
SUSAN Y. SOONG  
CLERK, U.S. DISTRICT COURT  
NO. DIST. OF CA.

BRIAN J. STRETCH (CABN 163973)  
United States Attorney

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

WHA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROOZBEH IRAVANI,

Defendant.

CR 17 0340  
CASE NO.

VIOLATION:

18 U.S.C. § 2252(a)(4)(B) – Possession of Child  
Pornography; 18 U.S.C. § 2253 – Criminal Forfeiture

SAN FRANCISCO VENUE

INDICTMENT

The Grand Jury charges:

COUNT ONE: (18 U.S.C. § 2252(a)(4)(B) – Possession of Child Pornography)

Beginning on a date unknown, but continuing through on or about March 10, 2017, in the  
Northern District of California, the defendant,

ROOZBEH IRAVANI,

did knowingly possess matter which contained at least one visual depiction that had been shipped and  
transported using a means and facility of interstate and foreign commerce, and in and affecting interstate  
and foreign commerce, and which was produced using materials that had been mailed, shipped, and  
transported in interstate commerce, by any means including by computer, the production of which

INDICTMENT

involved the use of a minor who had not attained 12 years of age, engaging in sexually explicit conduct, and which visual depiction was of such conduct, in violation of Title 18, United States Code, Section 2252(a)(4)(B).

FORFEITURE ALLEGATION: (18 U.S.C. §§ 2253(a)(1)-(3) – Criminal Forfeiture)

1. The allegations contained in Count One of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 2253.

2. Upon conviction of an offense in violation of Title 18, United States Code, Section 2252, the defendant,

ROOZBEH IRAVANI,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253, (a) any visual depiction described in Title 18, United States Code, sections 2251, 2251A, 2252, or 2252A or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Title 18, United States Code, Chapter 110; (b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense; and (c) any property, real or personal, used or intended to be used to commit or to promote the commission of the offense, including but not limited to the following items:

a. Dell Inspiron 7720 laptop computer, service tag: 3542FT1;

b. Toshiba MQ01AB100 1TB hard drive, s/n Y3HKSAM9S;

3. If any of the property described above, as a result of any act or omission of the defendant,

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b)

INDICTMENT



1 and by Title 28, United States Code, Section 2461(c).

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3 DATED: 20 JUNE 2017

A TRUE BILL.

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FOREPERSON

BRIAN J. STRETCH  
United States Attorney

BARBARA VALLIERE  
Chief, Criminal Division

(Approved as to form: AUSA RANDALL LEONARD)

INDICTMENT